

**Federal Defenders
OF NEW YORK, INC.**

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February 17, 2023

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
New York, New York 10007

Defendant Robin Tellier's application to travel to the District of New Jersey from February 20, 2023, through February 24, 2023, is GRANTED. Defendant's may renew his application to modify his supervised release conditions noting the Government's position. The Clerk of the Court is directed to terminate the letter motion at docket number 535.

**Re: United States v. Robin Scott Tellier
92 Cr. 869 (LGS)**


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Honorable Judge Schofield,

I write to request that Robin Scott Tellier's supervised release conditions be modified to permit him to travel to the District of New Jersey.

Since Mr. Tellier's release, he has adjusted well to life in the community and complied with all the terms of his supervised release. Most recently, in January, he helped open a pizzeria in Queens and has been working full-time there. He has also continued to live with his wife and son.

Mr. Tellier would like to travel to New Jersey for several reasons. Next week is a school break week and he would like to take his son to New Jersey for a few days. In addition, Mr. Tellier has a doctor (who is also a long-time family friend) whose office is in New Jersey. He continues to have many friends in the state. Finally, in connection with his work at the pizzeria, he recently contracted with a restaurant supply store located in New Jersey, and he would like to be able to periodically travel there for supplies.

Accordingly, I am requesting that the Court modify Mr. Tellier's supervised release to allow him to travel to New Jersey without advance court permission (but with prior notice to his Probation Officer). If the Court declines to order this general modification, I alternatively request that Mr. Tellier be permitted to travel to New Jersey next week, between February 20 to 24, 2023.

I have conferred with EDNY Probation Officer James and I understand she does not object to this request. I have reached out to AUSA Kaylan Lasky, but do not yet know the government's position. Thank you for your consideration of this request.

Respectfully submitted,

/s/

Sarah Baumgartel

Assistant Federal Defender

cc: AUSA Kaylan Lasky (by ECF)